

EXHIBIT A

From: [Barlow, Katie \(Litigation-WAS\)](#)
To: [Carter, Sean](#); [Cottreau, Steven \(Litigation-WAS\)](#)
Cc: [rhaefele@motleyrice.com](#); [Tarbutton, J. Scott](#); [juanmorillo@quinnemanuel.com](#); [Mallat, Wajdi \(Litigation-WAS\)](#); [Motala, Tasnim \(Litigation-WAS\)](#)
Subject: RE: Deposition Scheduling
Date: Friday, April 14, 2017 12:24:05 PM

Dear Sean,

We write to confirm the time, date, and location of Dr. Hussein Hamid Hassan's deposition.

As stated in our February 27 correspondence, the deposition will take place on Wednesday, May 3, 2017 and Thursday, May 4, 2017 beginning at 9:00 AM GMT and concluding at 1:00 PM GMT each day. The deposition will take place at the law offices of Quinn Emmanuel Urquhart & Sullivan, LLP, located at One Fleet Place London EC4M 7RA.

DIB reserves Wednesday, May 3, 2017 from 9:00 AM GMT until 1:00 pm GMT to conduct its direct examination of Dr. Hussein Hamid Hassan. Plaintiffs may conduct their cross examination on May 4, 2017 beginning at 9:00 AM GMT and concluding at 1:00 pm GMT.

We will send a formal notice confirming these details shortly.

All the best,

Katie Barlow
Associate
CLIFFORD CHANCE US LLP
2001 K Street, NW
Washington, DC 20006
Direct Dial: +1 202 912 5195
Switchboard: +1 202 912 5000
Fax: +1 202 912 6000
katie.barlow@cliffordchance.com
<http://www.cliffordchance.com>

From: Carter, Sean [<mailto:SCarter1@cozen.com>]
Sent: Friday, April 14, 2017 9:08 AM
To: Cottreau, Steven (Litigation-WAS)
Cc: [rhaefele@motleyrice.com](#); [Tarbutton, J. Scott](#); Barlow, Katie (Litigation-WAS); [juanmorillo@quinnemanuel.com](#)
Subject: Re: Deposition Scheduling

Steve - I may have missed something, but I do not recall seeing a formal Notice for this proposed deposition. Please advise. Thanks, Sean

Sent from my iPhone

On Feb 28, 2017, at 9:10 AM, Carter, Sean <SCarter1@cozen.com> wrote:

Steve – The dates work for folks on our side. We have not discussed any potential issues relating to location, duration or sequence of depositions that might be implicated by this proposal. For the time being, we think it makes sense to lock in the dates, and we can address any other issues presented by the proposed deposition, if there are any, in due course. Thanks, Sean



Sean P. Carter

Member | Cozen O'Connor

One Liberty Place | 1650 Market Street, Suite 2800 | Philadelphia, PA 19103

P: 215-665-2105 F: 215-701-2105

[Email](#) | [Bio](#) | [LinkedIn](#) | [Map](#) | [cozen.com](#)

From: steve.cottreau@cliffordchance.com [<mailto:steve.cottreau@cliffordchance.com>]

Sent: Monday, February 27, 2017 6:02 PM

To: Carter, Sean <SCarter1@cozen.com>

Cc: rhaefele@motleyrice.com; Tarbutton, J. Scott <STarbutton@cozen.com>;
Katie.Barlow@CliffordChance.com; juanmorillo@quinnemanuel.com

Subject: Deposition Scheduling

Sean,

I hope you are well.

As we discussed a short time ago, given the pace of discovery we would like to move forward with one or more depositions to preserve testimony. Towards that end, we propose to take the deposition of Dr. Hussein Hamid Hassan, Chairman of DIB's Fatwa and Sharia Supervisory Board. We propose taking his 7 hour deposition in London over two half days on the mornings of May 3 and 4.

Can you let me know if these dates work for you and we will notice the deposition and make arrangements for it?

Best,

Steve

Steven T. Cottreau

CLIFFORD CHANCE US LLP

2001 K Street NW

Washington, DC 20006

Direct 202-912-5109

Main 202-912-5000

Fax 202-912-6000

steve.cottreau@cliffordchance.com

[CC]81-40478250[/CC]

This message and any attachment are confidential and may be privileged or otherwise protected from disclosure.
If you are not the intended recipient, please telephone or email the sender and delete this message and any attachment from your system. If you are not the intended recipient you must not copy this message or attachment or disclose the contents to any other person.

Clifford Chance as a global firm regularly shares client and/or matter-related data among its different offices and support entities in strict compliance with internal control policies and statutory requirements.
Incoming and outgoing email communications may be monitored by Clifford Chance, as permitted by applicable law and regulations.

For further information about Clifford Chance please see our website at <http://www.cliffordchance.com> or refer to any Clifford Chance office.

Switchboard: +1 202 912 5000
Fax: +1 202 912 6000

To contact any other office
http://www.cliffordchance.com/people_and_places/people.html

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.